

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

THE LOUIS D. BRANDEIS CENTER
FOR HUMAN RIGHTS UNDER LAW
and JEWISH AMERICANS FOR
FAIRNESS IN EDUCATION,

Plaintiffs,

v.

PRESIDENT AND FELLOWS OF
HARVARD COLLEGE,

Defendant.

Case No. 1:24-cv-11354-RGS

**DEFENDANT'S ASSENTED TO MOTION
TO EXTEND TIME TO ANSWER PLAINTIFFS' COMPLAINT**

Pursuant to Local Rule 7.1(b), Defendant President and Fellows of Harvard College ("Harvard") respectfully requests a modest extension of time in which to file its Answer to Plaintiffs' Complaint (Dkt. 1). Harvard's Answer is currently due on Tuesday, November 19, 2024. While Harvard is working diligently to complete its Answer, Harvard believes that additional time is necessary to address the volume and scope of the allegations in the Complaint, which is 70 pages long and includes 241 paragraphs of allegations. Dkt. 1. Due to these features of Plaintiffs' Complaint, as well as professional and personal obligations of Harvard and its counsel (including the upcoming Thanksgiving holiday), Harvard requests that it be permitted to file its Answer by Tuesday, December 10, 2024. This extension will not otherwise affect the schedule entered by the Court (Dkt. 75). Undersigned counsel conferred with counsel for Plaintiffs on November 8, 2024, and Plaintiffs consent to the requested extension.

WHEREFORE, Harvard respectfully requests that the Court grant its motion for an extension of the time to file its Answer to Plaintiffs' Complaint.

DATED: November 11, 2024

Respectfully Submitted,

PRESIDENT AND FELLOWS OF HARVARD
COLLEGE

By its attorneys,

Mark A. Kirsch (*pro hac vice*)
KING & SPALDING LLP
1185 Avenue of the Americas
34th Floor
New York, NY 10036
mkirsch@kslaw.com
Tel: (212) 790-5329
Fax: (212) 556-2222

/s/ Felicia H. Ellsworth

Felicia H. Ellsworth, BBO #665232
WILMER CUTLER PICKERING
HALE AND DORR LLP
60 State Street
Boston, MA 02109
Tel: (617) 526-6000
Fax: (617) 526-5000
felicia.ellsworth@wilmerhale.com

Seth P. Waxman (*pro hac vice*)
Bruce M. Berman (*pro hac vice*)
Jeremy W. Brinster (*pro hac vice*)
WILMER CUTLER PICKERING
HALE AND DORR LLP
2100 Pennsylvania Avenue NW
Washington, DC 20037
Tel: (202) 663-6000
Fax: (202) 663-6363
seth.waxman@wilmerhale.com
bruce.berman@wilmerhale.com
jeremy.brinster@wilmerhale.com

LOCAL RULE 7.1 CERTIFICATION

In accordance with Local Rule 7.1(a), the undersigned hereby certifies that on November 8, 2024, counsel for Harvard conferred with counsel for Plaintiffs, and Plaintiffs consent to this Motion.

/s/ Felicia H. Ellsworth

Felicia H. Ellsworth

CERTIFICATE OF SERVICE

I hereby certify that on November 11, 2024, I caused this document to be filed through the CM/ECF system, where it will be sent electronically to the registered participants as identified on the Notice of Electronic Filing.

/s/ Felicia H. Ellsworth

Felicia H. Ellsworth